

EXHIBIT C

f. Quiana Griffin

African American student Quiana Griffin suffered several adverse actions at the hands of Lower Merion. First, Quiana was evaluated despite the fact that LMSD never obtained written permission to do so from her mother. SOF ¶ 165. Second, LMSD never provided the requisite procedural safeguards notices to Quiana's mother during subsequent IEP meetings, so she had no idea what were her rights in this respect. SOF ¶ 166. LMSD never informed Quiana's mother that she could seek an independent evaluation if she disagreed with the district's evaluation of her daughter. SOF ¶ 182.

Third, despite testing at levels of average intelligence, LMSD incorrectly classified Quiana as having disabilities in reading comprehension and math. SOF ¶¶ 169, 200-202. She did not meet the criteria for a SLD in language arts. SOF ¶ 200. Additionally, despite having indisputably average reading comprehension skills, LMSD placed Quiana in the predominantly African American REACH program, and kept her in that program over Quiana's mother's objections. SOF ¶¶ 168-183. In fact, no member of Quiana's middle school IEP team ever informed her mother that Quiana consistently earned average scores on reading comprehension tests administered during middle school. SOF ¶ 190. Inexplicably, LMSD continued to recommend that Quiana receive an IEP in reading comprehension notwithstanding that she scored "Proficient" on her 8th grade PSSA examination. *Id.*

Fourth, Quiana was prohibited from taking any history classes during middle school because such classes were scheduled during the same time Quiana was forced to attend the special education classes in which she was incorrectly placed by LMSD. SOF ¶ 191.